

John K. Turner
State Bar No. 00788563
ALLMAND LAW FIRM, P.L.L.C.
860 Airport Freeway, Suite 401
Hurst, TX 76054
214.265.0123 Phone
214.265.1979 Fax
ATTORNEY FOR PLAINTIFF

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**MAURICIO ANTONIO REYMUNDO
ASHLEY MOORE REYMUNDO,
Debtors**

§
§
§
§
§

**Case No. 16-32263-SWE-13
Chapter 13**

**ASHLEY MOORE REYMUNDO
v.**

§
§
§
§
§
§
§
§

**Chapter 7
Adversary No. 21-03049-SWE**

**THE UNITED STATES DEPARTMENT
OF EDUCATION, et al.**

**STIPULATION TO DISMISS DEFENDANTS
UNITED STATES DEPARTMENT OF EDUCATION
AND EDUCATIONAL CREDIT MANAGEMENT CORPORATION**

Plaintiff, Ashley Moore Reymundo (“Plaintiff”), and Defendants United States Department of Education (“US DOE”) and Educational Credit Management Corporation (“ECMC”), by and through their respective attorneys, hereby stipulate as follows:

1. On June 6, 2016, Mauricio and Ashley Reymundo (“Debtors”) filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. On July 16, 2021, a general discharge Order was entered in the Debtors’ bankruptcy case.

3. On July 18, 2021, Plaintiff filed a Complaint, seeking a discharge of debt pursuant 11 U.S.C. §523(a)(8).
4. On September 1, 2021, the Complaint was amended to add US DOE and ECMC as party defendants.
5. Both US DOE and ECMC are the holders of certain student loans owed by the Plaintiff.
6. Plaintiff no longer wishes to pursue dischargeability of the student loans and desires to terminate this litigation through an agreed dismissal of Defendants US DOE and ECMC.
7. Based on the above, the Plaintiff and Defendants US DOE and ECMC agree and stipulate to the dismissal of US DOE as a Defendant.
8. This stipulation upon approval by the Court will result in a conclusion of this litigation by resolving all claims before the Court in this adversary proceeding.

WHEREFORE, the parties pray this Honorable Court for an Order approving this Stipulation and dismissing US DOE and ECMC as Defendants in this adversary proceeding.

Respectfully Submitted,

/s/ John K. Turner
John K. Turner
State Bar No. 00788563
ALLMAND LAW FIRM, P.L.L.C.
860 Airport Freeway, Suite 401
Hurst, TX 76054
214.265.0123 Phone
214.265.1979 Fax
ATTORNEY FOR PLAINTIFF

CHAD E. MEACHAM
UNITED STATES ATTORNEY

By: /s/ Donna K. Webb
Donna K. Webb
Assistant United States Attorney
State Bar No. 21024000

U.S. Attorney Office
1100 Commerce Street
Suite 300
Dallas, TX 75242
214-659-8600
Fax : 214-659-8807
Email: donna.webb@usdoj.gov

Attorneys for Defendant United
States of America Department of
Education

DONALD W. COTHERN
State Bar No. 04858550
Kent, Anderson, Bush, Frost &
Metcalf, P.C.
2320 Dueling Oaks Drive
Tyler, Texas 75703
(903) 579-7531
(903) 581-3701
dcothen@kabfm.net

ATTORNEYS FOR DEFENDANT
EDUCATIONAL CREDIT
MANAGEMENT CORPORATION

CHAD E. MEACHAM
UNITED STATES ATTORNEY

By: _____
Donna K. Webb
Assistant United States Attorney
State Bar No. 21024000

U.S. Attorney Office
1100 Commerce Street
Suite 300
Dallas, TX 75242
214-659-8600
Fax : 214-659-8807
Email: donna.webb@usdoj.gov

Attorneys for Defendant United
States of America Department of
Education



DONALD W. COTHERN
State Bar No. 04858550
Kent, Anderson, Bush, Frost &
Metcalf, P.C.
2320 Dueling Oaks Drive
Tyler, Texas 75703
(903) 579-7531
(903) 581-3701
dcothen@kabfm.net

ATTORNEYS FOR DEFENDANT
EDUCATIONAL CREDIT
MANAGEMENT CORPORATION

CERTIFICATE OF SERVICE

The undersigned certifies that on September 21, 2022, the following parties were served a true copy of the foregoing pleading via first class US Mail.

Donna K. Webb
Assistant US Attorney
1100 Commerce St., Ste. 300
Dallas, Texas 75242

Donald W. Cothorn
Kent, Anderson, Bush, Frost & Metcalf, P.C.
2320 Dueling Oaks Dr.
Tyler, Texas 75703

/s/ John K. Turner
John K. Turner
State Bar No. 00788563